

1 Matthew I. Knepper, Esq.
2 Nevada Bar No. 12796
3 Miles N. Clark, Esq.
4 Nevada Bar No. 13848
5 KNEPPER & CLARK LLC
6 10040 W. Cheyenne Ave., Suite 170-109
7 Las Vegas, NV 89129
8 Phone: (702) 825-6060
9 Fax: (702) 447-8048
10 Email: matthew.knepper@knepperclark.com
11 Email: miles.clark@knepperclark.com

12 David H. Krieger, Esq.
13 Nevada Bar No. 9086
14 HAINES & KRIEGER, LLC
15 8985 S. Eastern Ave., Suite 350
16 Henderson, NV 89123
17 Phone: (702) 880-5554
18 Fax: (702) 385-5518
19 Email: dkrieger@hainesandkrieger.com

20 *Attorneys for Plaintiff*

21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF NEVADA**

23 WILLIE HENRY,

24 Plaintiffs,

25 vs.

26 DOVENMUEHLE MORTGAGE; EXPERIAN
27 INFORMATION SOLUTIONS, INC.;
28 EQUIFAX INFORMATION SERVICES LLC;
and TRANS UNION LLC,

Defendants.

Case No.: 2:19-cv-00360-MMD-NJK

**JOINT MOTION TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
EXPERIAN INFORMATION
SOLUTIONS, INC.'S MOTION TO
DISMISS COMPLAINT**

[FIRST REQUEST]

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JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION TO DISMISS COMPLAINT [FIRST REQUEST] - 1

1 Plaintiff Willie Henry (“Plaintiff”) and Defendant Experian Information Solutions, Inc.
2 (“Experian”), by and through their counsel of record, hereby move jointly to extend Plaintiff’s
3 deadline to file a response to Experian’s Motion to Dismiss Complaint (7) seven days.
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5 1. On February 28, 2019, Plaintiff filed a Complaint [ECF Dkt. 1].

6 2. On April 15, 2019, Experian filed a Motion to Dismiss the Complaint [ECF
7 Dkt.11].

8 3. Plaintiff’s Response is due April 29, 2019.

9 4. Plaintiff and Experian have agreed to extend Plaintiff’s response seven days in
10 order to allow Plaintiff’s counsel to contact the client to address Experian’s pending motion to
11 dismiss and obtain approval to file the response. As a result, both Plaintiff and Experian hereby
12 request this Court to further extend the date for Plaintiff to respond to Experian’s Motion to
13 Dismiss Complaint until **May 6, 2019**. This joint motion is made in good faith, is not interposed
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for delay, and is not filed for an improper purpose.

Dated April 29, 2019.

KNEPPER & CLARK LLC <u>/s/ Miles N. Clark</u> Matthew I. Knepper, Esq. Nevada Bar No. 12796 Miles N. Clark, Esq. Nevada Bar No. 13848 10040 W. Cheyenne Ave., Suite 170-109 Las Vegas, NV 89129 Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com HAINES & KRIEGER LLC David H. Krieger, Esq. Nevada Bar No. 9086 8985 S. Eastern Avenue, Suite 350 Henderson, NV 89123 Email: dkrieger@hainesandkrieger.com <i>Counsel for Plaintiff</i>	NAYLOR & BRASTER <u>/s/ Andrew J. Sharples</u> Jennifer L. Braster, Esq. Nevada Bar No. 9982 Andrew J. Sharples, Esq. Nevada Bar No. 12866 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145 Email: jbraster@nblawnv.com Email: assharples@nblawnv.com JONES DAY Cheryl L. O'Connor, Esq. 3161 Michelson Drive Irvine, CA 92612 Email: coconnor@jonesday.com <i>Counsel for Defendant Experian Information Solutions, Inc.</i>
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ORDER GRANTING
JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO
EXPERIAN'S MOTION TO DISMISS COMPLAINT

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

Dated: April 29, 2019

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am an employee of KNEPPER & CLARK LLC and that on April 29, 2019, I caused the document **JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION TO DISMISS COMPLAINT** to be served through the Court's CM/ECF to all parties appearing in this case.

/s/ Lucille Chiusano
An employee of KNEPPER & CLARK LLC